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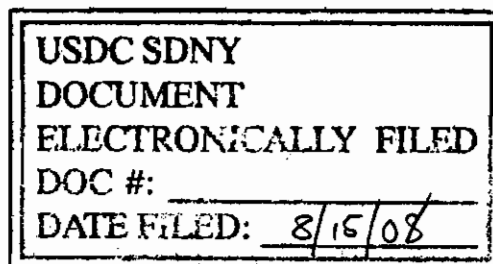
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August 13, 2008



BY FAX (212) 805-7906

Honorable Denny Chin
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Baja Ferries USA LLC v. Calder Seacarrier Corp. a/k/a
Calder Sea Carrier Corp., Fenby Co. a/k/a
Fenby Co. Ltd., United Shipping Agency SRL, Bristol
Marine Co. Ltd. and BML Chartering
Docket No. 08 CV 6031 (DC)
Our file: E-605

Honorable Sir:

We are the attorneys for the plaintiff, Baja Ferries USA LLC. For the reasons set forth below we are requesting a brief extension for the submission of opposing papers in connection with a motion made by Defendant, United Shipping Agency SRL ("United").

United moved to vacate the order of maritime attachment issued against it in this matter and the release of an electronic funds transfer in the amount of \$50,000 which was attached pursuant to the order of maritime attachment. On Monday, August 4, 2008, the attorneys for the parties, while appearing before your Honor in Court, agreed that United would submit its moving papers by Wednesday, August 6, 2008. However, counsel for United requested, and we agreed that United could submit its moving papers on Friday, August 8. Plaintiff's opposing papers would then be due on Thursday, August 14.

My partner, James Rau, who is in charge of this case, has developed a serious skin condition requiring him to take anti-immune medication to counteract the condition. The combination of his condition, required attendance at his doctor's office and medication have made it impossible for Mr. Rau to confer with plaintiff to draft an opposing declaration or to

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United States District Judge

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prepare an opposing memorandum of law. In the circumstances, Mr. Rau, who has been unable to come into the office this week telephoned United's counsel from his home and requested counsel to agree to a brief extension of time for the submission of answering papers until Tuesday, August 19. Counsel for United refused to agree to the extension, unless we agreed to refrain from serving the attachment with respect to United or restraining any of its funds until there was a decision from the Court with respect to United's motion. This would obviously prejudice plaintiff's rights, and therefore, plaintiff cannot agree to such condition.

In view of the above, we respectfully request the Court to allow plaintiff to file its opposing papers no later than 5:00 pm on Tuesday, August 19, 2008.

Thank you for your consideration of this request.

Respectfully yours,

CARDILLO & CORBETT


By:


Tulio R. Prieto

TRP/lf

cc: Gina M. Venezia, Esq.
Freehill, Hogan & Mahar
Fax No. 212-425-1901

Approved.
Reply papers
are now due 8/26/08.
SO ORDERED,


WJS
8/15/08